

Exhibit A

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September 15, 2023

Stephanie Wickowski
Locke Lord LLP
200 Vesey Street, 20th Floor
New York, NY 10281

Re: *Celsius Network Limited v. StakeHound SA*, A.P. No. 23-01138 (MG) (Bankr. S.D.N.Y.)

Dear Stephanie:

We write concerning the motion to shorten notice (the “Motion”) filed today by StakeHound SA (“StakeHound”) concerning a further motion StakeHound has sought to have heard in advance of the preliminary injunction hearing currently scheduled for September 27, 2023.

In the Motion, StakeHound claims it needs “emergency” relief – meaning relief that cannot wait until the hearing on September 27, 2023 – relating to StakeHound’s alleged “need to maintain its validator nodes, and to pay the attorneys’ fees and costs associated with prosecuting and defending its critical ongoing litigation.” The Court has accommodated StakeHound by scheduling a hearing for Tuesday, September 19, 2023, and providing a briefing schedule for both sides.

In an effort to avoid the substantial cost and expense of that briefing and hearing, we again ask you to please immediately identify, in writing, the specific amount(s), recipient(s), due date(s), and purpose(s) of the payment(s) you contend must be made on or before September 27, 2023 in order to “maintain the validator nodes.” I am confident that if StakeHound can actually demonstrate such payment is necessary, we can reach agreement to ensure that it is timely paid without requiring the Court’s intervention or spending tens of thousands of dollars on additional briefing.

Likewise, to the extent you contend that some payment must be made on or before September 27, 2023 in connection with StakeHound’s “ongoing litigation,” please identify in writing the specific amount(s), due date(s), and purpose(s) of the payment(s) you contend are necessary, and how non-payment on or before September 27, 2023 would harm StakeHound or diminish the value of the Subject Property. To the extent you can do so, it is possible the very expensive process on which you appear determined to embark between now and the hearing on Tuesday can be avoided. We therefore urge you to supply this information immediately.

Please be advised that Celsius intends to seek costs, attorneys’ fees, and other sanctions from the Court, including in the event that StakeHound again fails to demonstrate a genuine “emergency” exists



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justifying the significant expense it is about to foist on Celsius and its creditors through its motion, or fails to seek reasonably to avoid that expense by promptly providing Celsius the information set forth above.

Nothing herein constitutes a waiver of any of Celsius' rights, remedies, claims, or defenses, all of which expressly are reserved.

Sincerely,

/s/ Mitchell P. Hurley

Mitchell P. Hurley